

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
Stacey D. Calhoun : No. 18-11887-JKF
Debtor

ANSWER TO MOTION OF *M&T Bank*
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. The Debtor had surgery and was out of work for several months. The Debtor's medical issues began in April 2018. The Debtor asks for a chance to amend her plan to include the post-petition arrears as she just returned to work full time last month.
7. Denied.
8. Denied. Debtor is aware and asks for a chance to get caught up with payments now that she is back to work full time after recovering from surgery.
9. Denied.
10. Admitted.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 8/15/18

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
Reginald Rico Geter : No. 16-17148-JKF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer to Motion for Relief was served on October 17, 2017, on the Chapter 13 Standing Trustee, William C. Miller, Esquire, and Matteo S. Weiner, Esquire, by electronic mail.

/s/ David M. Offen
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